

1 MR. HORTON: We'll take care of that.

2 COMMISSIONER DEASON: Thank you.

3 UNIDENTIFIED SPEAKER: My apologizes.

4 MR. KITCHINGS: May I proceed, Madam

5 Chairman?

6 CHAIRMAN JOHNSON: Uh-huh.

7 COMMISSIONER CLARK: Let me interrupt just a
8 minute.

9 One of the things you are concerned about in
10 the Prehearing Order is you don't want to be limited
11 in how you can publish this directory. And as I
12 understand it the tariff limits you to a printed
13 directory or CD ROM.

14 WITNESS SCREVEN: That's correct.

15 COMMISSIONER CLARK: Would you be very
16 specific as to what else you want?

17 WITNESS SCREVEN: Commissioner Clark, it's
18 hard to be specific on this at this point.

19 What we don't want is if new technology was
20 available to us or new ideas for the development of
21 subsequent products, we don't want to have limitations
22 imposed on us that we have to come back to this type
23 of forum in order to implement those things as
24 technology develops. And as you know it is developing
25 rapidly today. And that's all we ask is don't impose

1 limitations on us.

2 COMMISSIONER CLARK: Let me ask you a
3 question: Is it feasible to have -- and this may
4 illustrate my lack of sophistication -- a Web Page
5 that you would go to, or a database, that you could go
6 to through your computer and you would start at your
7 Web Page and then through the Web Page you would have
8 access to a directory?

9 WITNESS SCREVEN: Yes, ma'am.

10 COMMISSIONER CLARK: Is that something you
11 want to do?

12 WITNESS SCREVEN: Yes, ma'am.

13 COMMISSIONER CLARK: And you believe it's
14 prohibited now.

15 WITNESS SCREVEN: Yes, ma'am.

16 COMMISSIONER CLARK: Okay.

17 WITNESS SCREVEN: And the method -- if I
18 might, the method by which we would put it on the Web,
19 on the Internet as a Web Page, might be an actual
20 transfer of that data from our database electronically
21 onto that, or base that in the service provider where
22 people can access that the way Bell does it now, is by
23 housing the information with our service provider.

24 MR. KITCHINGS: May I proceed?

25 COMMISSIONER CLARK: Uh-huh.

1 Q (By Mr. Kitchings) Mr. Screven, I'd like
2 to explore that a little bit further.

3 In your direct testimony on Page 5 at Line 5
4 you use the Internet as an example of what you would
5 like to offer through your directory publishing. Is
6 that still correct? Or you give that as a sample of
7 what would be perhaps utilized in electronic format.
8 Is that still something you'd like to do?

9 A Yes.

10 Q Can you briefly, sir, walk us through how a
11 user of that particular service would access it, and
12 what they would have to do in order to find what they
13 were looking for?

14 A No, sir, I could not. I have -- even though
15 I have a working knowledge, it's enough just to be
16 confusing if I have to explain it on the process so I
17 would rather not go into that. I don't know
18 technically how it's done.

19 Q You just know you want to offer it.

20 A No. I just know that I don't want the
21 limitations imposed on me that would preclude me from
22 offering it if I so desired.

23 COMMISSIONER GARCIA: Without getting too
24 technical, just give me an understanding of what those
25 uses would be, without what you need it for, that

1 information.

2 WITNESS SCREVEN: In addition to any printed
3 materials?

4 COMMISSIONER GARCIA: Yeah.

5 WITNESS SCREVEN: All we've done,
6 Commissioner Garcia, is offer the Internet as an
7 example. I don't have any real specific alternatives
8 right now. And I know that there are things that
9 people are looking at as alternative sources of this
10 information to be published and delivered, whether it
11 be on CD ROM or on the Internet or whatever, those are
12 the only examples I know of that are feasible today
13 that are being utilized.

14 MR. KITCHINGS: Thank you.

15 Q (By Mr. Kitchings) We agreed earlier,
16 Mr. Screven, did we not, that at least for today
17 there's a difference between directory assistance and
18 directory publishing, didn't we?

19 A Yes.

20 Q And you'd still agree that that is a
21 distinction that the publishers are willing to abide
22 by. In other words, you have to desire to get into
23 directory assistance.

24 A That's correct. We have no desire to do
25 that.

1 Q So if this Commission were to decide through
2 this proceeding what constitutes a directory and what
3 constitutes directory advertising, you would abide by
4 that decision and not utilize information for
5 directory assistance purposes?

6 A No, sir, I could not do that because I don't
7 know what they would decide is the directory
8 advertising definition.

9 Q Okay. So you would not agree necessarily
10 then that the directory publishers want to just
11 publish directories. There's a possibility you might
12 want to get into directory assistance?

13 A Now, sir, that's not what I said. We would
14 not blanketly agree to some unknown definition, a
15 statement at this time without knowing what it was
16 ahead of time.

17 Q Mr. Screven, there's a difference between a
18 published directory in printed format and one that is
19 available in electronic format. Can we agree with
20 that statement?

21 A Yes.

22 Q Is there a differential in what you charge
23 for advertising in a printed directory as opposed to
24 what you charge in a electronic format?

25 A I'm not sure I can answer that because I've

1 not done that so I don't know if there's a difference.

2 Perhaps BellSouth knows. I don't know.

3 Q I'm asking about your directory, sir, not
4 BellSouth's. You don't publish anything in electronic
5 format today?

6 A No, we are prohibited right now.

7 Q You can do so in CD ROM even by today's
8 tariff, can you not?

9 A Yes, but I don't do it at this time.

10 Q You don't do that at this time. And you are
11 aware, sir, in data request responses BellSouth stated
12 that diskette was the same as CD ROM in terms of our
13 tariff. Have you seen a data request response?

14 A You mean the discovery?

15 Q Yes.

16 A Yes, I've seen that.

17 Q And you don't publish a directory on
18 diskette right now either, do you?

19 A I don't know what you mean by "get."

20 Q Diskette.

21 A On diskette. No. No, we don't know.

22 Q So the only type of directory you publish
23 today is in printed form?

24 A That's correct.

25 Q You don't know today whether you would

1 charge a different rate for advertising in electronic
2 media as opposed to what you would charge for printed
3 media; is that your testimony?

4 A I have no idea.

5 Q Last couple of questions, Mr. Screven.

6 I believe you stated in your testimony that
7 the independent directory publishers in Florida do not
8 currently subscribe to the WBAR service; is that
9 accurate?

10 A I'm not sure.

11 Q Do you have a copy of your testimony in
12 front of you?

13 A Yes.

14 Q Turn your attention to Page 8 of your direct
15 testimony, Line 18, and ask you to take a look at
16 that.

17 A Page 8. Okay. I've read that.

18 Q Okay. Can we agree that your testimony is
19 that Florida Independent Directory Publishers do not
20 currently subscribe to WBAR in Florida?

21 A None that I know of.

22 Q Okay. Are you aware, sir, that BellSouth
23 has, in fact, four WBAR customers in Florida?

24 A No, I'm not.

25 Q Are you aware that two of the four members

1 of your group that is listed in response to your data
2 request that you purport to represent here today?

3 A No, I'm not.

4 Q Does that surprise you to know that they
5 are, in fact, subscribers to DPDS?

6 A Not at all.

7 Q Why?

8 A That's their decision. I have no influence
9 in any shape, form or fashion as to what they decide
10 to do. That is a business decision they have made.

11 Q Yet you purport to represent their interests
12 here today and are asking for services that are
13 somewhat different than WBAR, do you not? (Pause)

14 A I purport that I am speaking as an
15 independent publisher in the state of Florida that has
16 discussed with other publishers in the state of
17 Florida, not all of them directly, this issue. And
18 that I -- whatever we're representing here and
19 whatever we can accomplish, they agree to and it is in
20 their best interest if we can prevail, yes.

21 Q Mr. Screven, can we agree that any changes
22 that are ordered from this proceeding that affect
23 WBAR, that those changes are going to impact the way
24 that BellSouth's four subscribers to that service
25 receive that service today?

1 A I'm not sure I can agree because I don't
2 know the effects it would have to BellSouth.

3 Q I'm not asking for the effects it has on
4 BellSouth, sir. I'm asking you can we agree as to the
5 four subscribers of that service -- if this Commission
6 were to order changes to WBAR, can we agree that the
7 data received by those four customers is going to
8 change?

9 A I believe that's probably true, yes.

10 Q Thank you.

11 MR. KITCHINGS: Madam Chairman, if I might
12 have just a moment, I think I'm finished with my cross
13 examination. (Pause)

14 COMMISSIONER CLARK: While he's doing that
15 may I ask a question? First of all is it Mr. or
16 Ms. Juneau?

17 MR. CARVER: Mr. Juneau.

18 COMMISSIONER CLARK: I guess we need to make
19 that correction in your -- I guess it's the rebuttal
20 testimony.

21 You indicated there were some cost figures,
22 and I think you said you spend 4 cents for each entry
23 and it costs BellSouth .006. Is that what you said?

24 WITNESS SCREVEN: .003, 3 mills.

25 COMMISSIONER CLARK: Where is that in your

1 testimony?

2 WITNESS SCREVEN: I think it's on the
3 interrogatory responses -- (Pause) -- it's on Page 3
4 of Staff's Set of Interrogatories, numbers 18 through
5 30, to the Florida Directory Publishers, and it's on
6 Page 3.

7 MR. HORTON: It's also on Page 10 of his
8 direct testimony.

9 WITNESS SCREVEN: I see what you're saying
10 in this answer. Excuse me.

11 COMMISSIONER CLARK: For the base
12 information I guess -- is DPDS what you get each year?

13 WITNESS SCREVEN: Yes, ma'am.

14 COMMISSIONER CLARK: And that costs you 4
15 cents a listing; is that correct?

16 WITNESS SCREVEN: That's correct.

17 COMMISSIONER CLARK: And the WBAR, you get
18 the new information, is that correct, on business
19 listings?

20 WITNESS SCREVEN: Yes, ma'am.

21 COMMISSIONER CLARK: And you pay .00 -- or
22 you pay .006 for those listings.

23 WITNESS SCREVEN: Not just for the listings
24 that are updated, Commissioner. We pay .006 for every
25 single listing in that central office file, including

1 residential. That's where the bundling comes in that
2 they -- to give you a example --

3 COMMISSIONER CLARK: Okay. I understand
4 that. But what I'm trying to understand is the DPDS
5 is something you get on a yearly basis. And what is
6 that? Do you buy it on a central office basis?

7 WITNESS SCREVEN: Either the central office
8 or prefixes, yes.

9 COMMISSIONER CLARK: And then the update
10 is -- so you get all new information on all -- you get
11 every listing in a central office with the DPDS and
12 you pay 4 cents for each listing; is that correct?

13 WITNESS SCREVEN: Yes.

14 COMMISSIONER CLARK: Okay, then the YBAR
15 (sic) you get all of the information for a central
16 office or prefix for business lines and you pay .006?

17 WITNESS SCREVEN: We don't get all of the
18 information. The rate is just based on all of the
19 listings. All we receive is the changes, the business
20 activity.

21 COMMISSIONER CLARK: All right. In your
22 opinion -- I guess I was not clear as to whether or
23 not you want to get what BAPCO is getting. I think
24 the testimony of Mr. Juneau was that there were no
25 takers for what BAPCO was getting.

1 WITNESS SCREVEN: There were no takers for
2 what BellSouth offered and purported to be what BAPCO
3 got in the format that they offer it. And our problem
4 was with the format and the rates, not the
5 information.

6 COMMISSIONER CLARK: Well, let me ask it a
7 different way: Is it your testimony it would be
8 acceptable to you to get the same updated information
9 on a daily or monthly basis that BAPCO gets and in the
10 same format?

11 WITNESS SCREVEN: I can't agree to that
12 because I'm not 100% sure of the format they gave it
13 to at BAPCO.

14 COMMISSIONER CLARK: Let me tell you where
15 my confusion is. On the one hand you say you want
16 what they are giving BAPCO and on the other hand you
17 say you don't know what they are giving BAPCO and I'm
18 just trying to figure out --

19 WITNESS SCREVEN: I think the confusion,
20 Commissioner, is based on -- we've had problems
21 reading tapes we get from Bell right now on that. And
22 deciphering all of the information and the cumbersome
23 format and the amount of data that is not beneficial
24 to us involved in the tapes that we currently buy from
25 them. And we don't know what type of information --

1 and I'm sure there's a lot more of that information
2 that is transmitted to BAPCO on a daily basis, but
3 it's not in that volume. All we want is just
4 reasonable access to that same information so we can
5 utilize it for the publishing of directories. And
6 we're kind of at a disadvantage because we don't know
7 for sure what format and how BellSouth would offer
8 this.

9 COMMISSIONER CLARK: You were asked a
10 question on telemarketing. Do you sell your
11 directories or information to telemarketers?

12 WITNESS SCREVEN: No, ma'am.

13 CHAIRMAN JOHNSON: Let me follow up on one
14 of those questions.

15 You stated that WBAR was more than just
16 business customers. I thought your testimony
17 suggested that WBAR was limited to business customers.

18 WITNESS SCREVEN: That's the confusing part
19 on this, Commissioners, is that the information is
20 only business activity, but the rate is predicated on
21 the entire database.

22 As an example, if there are 100,000 people
23 in that database and we order the business activity
24 report and say there were only 500 business activity
25 reported in that monthly basis, we're not charged

1 .006 for the 500; we're charged .006 for the 100,000
2 listings which equates to \$600, or a \$1.25 per listing
3 for the 500 we net out of it. And that's the basis
4 that there's been a tremendous amount of confusion
5 around here by the way Bell has structured their
6 pricing on that service.

7 CHAIRMAN JOHNSON: Run that one by me again.
8 I'm looking at the testimony here on Page 10.

9 So you said in a central office with 100,000
10 customers you would pay the .006 per listing everytime
11 the WBAR as obtained. I guess my confusion was I was
12 assuming that the 100,000 customers would all be
13 business customers, and you're saying it would be all
14 of the customers in that particular central -- all of
15 the customers, period.

16 WITNESS SCREVEN: Yes, ma'am. That's what
17 the rate is based on.

18 CHAIRMAN JOHNSON: Okay. Thanks. Go ahead
19 I'm sorry.

20 MR. KITCHINGS: Madam Chairman, I have
21 concluded my cross examination. However, I would like
22 to make a request of a late-filed data request. And
23 what I would request is that we be provided the names
24 of all the directory publishers who are contributing
25 funds to the prosecution of this case on behalf of the

1 Florida Independent Directory Publishers.

2 The reason we're making this request is we
3 believe there's really a question as to who is really
4 asking for these particular services and I believe
5 Mr. Screven's testimony was that a number of the
6 directory publishers are, in fact, contributing some
7 monetary assistance to this case going forward.

8 CHAIRMAN JOHNSON: Mr. Horton.

9 MR. HORTON: I don't have an objection to
10 that. I have to check with the witness as to how
11 quickly we can get that information.

12 CHAIRMAN JOHNSON: Okay. Give me a short
13 title for that then.

14 MR. KITCHINGS: "Numbers of Contributors."

15 CHAIRMAN JOHNSON: "Numbers of
16 Contributors."

17 MR. KITCHINGS: I should have said "Names of
18 Contributors" instead of "Numbers."

19 CHAIRMAN JOHNSON: Did the witness
20 understand the request?

21 WITNESS SCREVEN: Yes, ma'am. I can deliver
22 that to my counsel and he can distribute that.

23 CHAIRMAN JOHNSON: Very well. We will mark
24 that is as Late-filed No. 2, Names of Contributors.

25 (Late-Filed Exhibit 2 identified.)

1 MR. KITCHINGS: Thank you, Madam Chairman,
2 that concludes my cross examination.

3 MR. HORTON: Madam Chairman, as
4 clarification, you only want the contributors or are
5 you looking for the identification of those who have
6 authorized his appearance, because they may not be one
7 and the same. I assume you want those that have
8 authorized his appearance.

9 MR. KITCHINGS: No, sir. I requested
10 specifically the ones who were contributing funds to
11 this proceeding.

12 CHAIRMAN JOHNSON: Very well. Staff.

13 MR. PELLEGRINI: Chairman Johnson, Staff
14 would like a few moments to review the cross
15 examination requests.

16 CHAIRMAN JOHNSON: Okay. We'll take a
17 ten-minute break at this time.

18 MR. PELLEGRINI: Thank you.

19 (Brief recess taken.)

20 - - - - -

21 CHAIRMAN JOHNSON: We'll go back on the
22 record.

23 MR. PELLEGRINI: Yes, Chairman, we're ready
24 to proceed. Chairman Johnson, Staff wishes to have
25 Exhibit GS-2 marked for identification purposes.

1 CHAIRMAN JOHNSON: I'm sorry. Which
2 exhibit?

3 MR. PELLEGRINI: Exhibit GS-2 which consists
4 of FIDP's responses to Staff's Interrogatories 1, 2
5 and 3.

6 CHAIRMAN JOHNSON: Very good. We will mark
7 that as Exhibit No. 3.

8 (Exhibit 3 marked for identification.)

9 CROSS EXAMINATION

10 BY MR. PELLEGRINI:

11 Q Good morning, Mr. Screven. My name is
12 Charlie Pellegrini, I'm representing the Commission
13 Staff.

14 A Good morning, Mr. Pellegrini.

15 Q Mr. Screven, let me ask you to begin on
16 Page 25 of GS-2, you list yourself as president of
17 Direct Media Corporation; is that correct?

18 A Mr. Pellegrini, I don't have before me the
19 document that you're looking at. I need a copy of it
20 so I could follow along with.

21 Q It should be there at hand.

22 COMMISSIONER KIESLING: Yes, you do. In
23 that packet. The bottom one in that packet.

24 WITNESS SCREVEN: Thank you.

25 Q (By Mr. Pellegrini) It's the very last

1 pages of that packet. I can see them from here.

2 A All right. I have it.

3 Q On Pages 25 and 26?

4 A Yes, sir.

5 Q And as I said, there you list yourself as
6 president of Direct Media Corp; is that correct?

7 A Yes, sir. That is.

8 Q Are you an officer, director, or owner of
9 any other company involved in the publication of
10 directories?

11 A No, sir. I'm not.

12 Q Let me refer you to Pages 13 and 14 of your
13 direct testimony, Mr. Screven.

14 A All right. I have it.

15 Q And to Lines 21 and 22 at the bottom,
16 continuing through Line 5 on the next page. Lines 21
17 and 22 on 13, Lines 1 through 5 on 14?

18 A Yes.

19 Q All right. Here you propose that BellSouth
20 develop a way by which FIDP could daily download new
21 connect information from the Internet; is that
22 correct?

23 A Yes.

24 Q And further, your proposal would suggest
25 that this information could be provided in the form of

1 a bulletin board service; is that correct?

2 A Yes.

3 Q Do you understand that bulletin boards
4 generally allow public access?

5 A Generally, yes.

6 Q Would you then agree with me that if this
7 information were available of the bulletin board
8 access, that that would conflict with -- well, let me
9 ask you in the first place, do you consider that the
10 information that BellSouth would provide would be
11 proprietary in nature? The listing information?

12 A I'm not -- I'm not sure that I agree that
13 it's proprietary information. When it's published
14 it's public information and it's not copyrightable, so
15 I don't know what you mean by proprietary.

16 Q I simply mean that -- I simply mean to ask
17 you whether you think that BellSouth has an ownership
18 interest in that information, apart from copyright
19 considerations or anything else. Simply, do you
20 believe that BellSouth has an ownership or proprietary
21 interest in that information?

22 A On a very limited basis, yes.

23 Q What would the limitation be in your mind?

24 A Well, it's some sort of a safeguard to maybe
25 prevent some unauthorized use of the information.

1 Q All right. Then my question is given your
2 agreement that the information is to some extent at
3 least proprietary, if it were available on a bulletin
4 board, would that not represent a conflict to the
5 proprietary nature of that information?

6 A I'm not sure, Mr. Pellegrini, because I'm
7 not sure of the security requirements for a bulletin
8 board, although I know that you can have passwords for
9 access on the Internet or the bulletin board services.
10 I would assume you could do the same thing in this
11 manner.

12 Q All right. I'm not quite sure that you
13 answered this question in response to Mr. Kitchings'
14 line of questioning, but let me ask you whether or not
15 an update service was first discussed in the regional
16 negotiations between BellSouth and DPDS customers in
17 the 1994-1995 matter in Louisiana?

18 A Yes, an update service was discussed.
19 However, I think the confusing term, Mr. Pellegrini,
20 is the refresh service that was offered. That was a
21 BellSouth term as a supplier of the update service.

22 Q Did you say that was offered?

23 A The ultimate offer that BellSouth made as a
24 refresh product was in response to our request for an
25 update service.

1 Q I understand. Did the results -- did the
2 Louisiana negotiations between BellSouth and DPDS
3 customers result in the update service that BellSouth
4 subsequently tariffed in Louisiana?

5 A Mr. Pellegrini, I was not privileged, other
6 than just in minor discussions to the negotiations and
7 the ultimate conclusions in Louisiana. However, if -
8 the Commission permits, Mr. Hammock here was the
9 primary negotiator involved with that, and he could
10 give you direct testimony if it's necessary.

11 Q Then perhaps you can't answer my next
12 question, which I will ask you anyway. Does the
13 current DPDS tariff in Florida reflect what was agreed
14 to in Louisiana?

15 A I don't think so, but I could be wrong.

16 Q And I think you would agree that in this
17 proceeding FIDP is something that is different from
18 the currently tariffed update service; is that
19 correct?

20 A Yes.

21 Q And just to be clear, would you briefly
22 identify the differences?

23 A Of what we want as opposed to what is being
24 offered?

25 Q Of what you want by way of an update service

1 as opposed to what is currently available in
2 BellSouth's tariff.

3 A What we need as independent publishers in
4 Florida, or anywhere for that matter, is access to
5 this information which is not available from any other
6 source of subscriber list information to assure
7 timely, accurate and complete information. And what
8 BellSouth has put on the table and is offering does
9 not give us that equal access timely information at a
10 fair and reasonable price.

11 And some of the problems we have is the
12 bundling of the information, as well the bundling and
13 coattailing of rates on useless and unnecessary
14 information included in the offerings from them.

15 Q Let me refer your attention to Page 22 of
16 exhibit marked 2 for identification, handwritten 22,
17 which is -- is your Response to Staff's Interrogatory
18 28a.

19 CHAIRMAN JOHNSON: Exhibit 3, marked 3?

20 MR. PELLEGRINI: I'm sorry, 3, yes.

21 WITNESS SCREVEN: GS-3?

22 Q (By Mr. Pellegrini) No, no. The exhibit
23 marked 3, which is GS-2.

24 CHAIRMAN JOHNSON: Let me give that a short
25 title, Response to Staff's Interrogatories.

1 WITNESS SCREVEN: What page?

2 Q (By Mr. Pellegrini) I want you on Page 22,
3 handwritten 22.

4 A Okay. I follow you.

5 Q Are you with me there?

6 A Yes.

7 Q Okay. Does that response -- would you take
8 a moment to review that response?

9 A Response to 28a?

10 Q That's correct. (Pause)

11 A All right. Yes, I've read it.

12 Q Is that a complete and accurate statement of
13 what you seek in this proceeding by way of an update
14 service?

15 A The answer is yes, pretty much so. Although
16 there might be some technical or detail information
17 that needs clarification or explaining. But pretty
18 much, yes.

19 COMMISSIONER KIESLING: Mr. Screven?

20 WITNESS SCREVEN: Yes, ma'am.

21 COMMISSIONER KIESLING: I'm getting confused
22 and having a little trouble following.

23 Every time there's -- someone poses a
24 question about is this what you want, you qualify it
25 with yes, but there may be something else. I mean, I

1 need to understand what it is that you want with
2 specificity. What other technical things do you want?
3 Or is this it?

4 **WITNESS SCREVEN:** Well, perhaps I have
5 confused the situation, and maybe it's my own
6 safeguarding of being careful of what I'm saying,
7 Commissioner Kiesling, because I've found -- and I
8 don't mean this to be a derogatory statement -- but
9 I've found in my dealings with BellSouth that when you
10 say things to them that this is what you want without
11 technically being correct, sometimes it comes back to
12 bite you badly for dealing with them, and I'm
13 trying --

14 **COMMISSIONER KIESLING:** Mr. Screven, I don't
15 care about that. All I care about is what it is that
16 you want. You're dealing with the Florida Public
17 Service Commission now, not BellSouth. Tell us what
18 you want.

19 **WITNESS SCREVEN:** Okay. I apologize for
20 confusing the issue on this. And this is what we
21 want, yes, that's on my response on Page 22 to 28a.

22 **COMMISSIONER KIESLING:** Thank you.

23 **Q** (By Mr. Pellegrini) Before we leave that
24 place, Mr. Screven, explain, would you please, in the
25 first paragraph of that response, near the very end,

1 you say "and/or A to Z which includes etcetera." What
2 do you mean by A to Z?

3 A BellSouth has a menu that you -- or codes
4 that allow you to take every listing in their database
5 including the foreign listings and 800 numbers and so
6 forth that are maintained in their database, or you
7 can order it without those foreign or 800 numbers,
8 RCLs -- RCF numbers, excuse me; you can have it either
9 way.

10 Q A to Z means, what? The alphabetical
11 listing of --

12 A Of all of the listings in their database
13 that would appear in their directory as their
14 published directory, including foreign and 800
15 numbers.

16 Q Just a moment. (Pause)

17 A moment ago you identified your response to
18 Staff's Interrogatory 28a as being a complete and
19 accurate statement of what it is you require by way of
20 an update service, correct?

21 A Yes.

22 Q What is your understanding of BellSouth's
23 position relative to your need or your requirement?

24 A Is that they haven't offered it.

25 Q Have you some understanding of their reasons